

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-mc-00353-LJL

**DECLARATION OF AARON E. NATHAN
IN SUPPORT OF PLAINTIFFS' REPLY TO THE ORDER TO SHOW CAUSE**

I, Aaron E. Nathan, an attorney admitted to practice in this court, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs" or "Plaintiffs-Receivers") in the above-captioned action.

2. Attached as **Exhibit 1** is a true and correct copy of Ms. Ruby Freeman's receivership oath, executed in the presence of a notary pursuant to CPLR § 6402 on October 25, 2024.

3. Attached as **Exhibit 2** is a true and correct copy of Ms. Wandrea' Moss' receivership oath, executed in the presence of a notary pursuant to CPLR § 6402 on October 25, 2024.

4. On October 31, 2024, counsel for Plaintiffs-Receivers visited Mr. Giuliani's former New York Apartment. Upon viewing the New York Apartment, counsel for Plaintiffs-Receivers did not identify any framed signed Joe DiMaggio shirt.

5. On November 26, 2024, this Court held a hearing regarding, among other things, the status of Mr. Giuliani's efforts to comply with the Turnover Order that this Court issued on October 22, 2024 (ECF No. 62). Attached as **Exhibit 3** is a true and correct copy of the transcript from the November 26, 2024 Hearing.

6. As of the date of this filing, Mr. Giuliani has failed to sign the power of attorney documents needed to effectuate the transfer of ownership interest in the New York Apartment, which Plaintiffs-Receiver asked Mr. Giuliani to sign in-person at the November 7, 2024 Hearing.

7. On December 26, 2024, in connection with the Homestead Action, 24-cv-6563, counsel for Plaintiffs deposed Monsignor Alan Placa in Palm Beach, Florida. A true and correct copy of the transcript of Monsignor Alan Placa's deposition is attached as **Exhibit 4**.

8. On December 27, 2024, counsel for Plaintiffs-Receiver corresponded through email with employees at Citibank N.A. responsible for setting up Plaintiffs-Receiver escrow account. Counsel for Plaintiffs-Receiver confirmed that there has been no transfer of funds from any account to Plaintiffs-Receiver's Citibank escrow account as of December 27, 2024.

9. On December 27, 2024, counsel for Plaintiffs deposed Rudolph W. Giuliani in Palm Beach, Florida. A true and correct copy of the transcript of Mr. Giuliani's deposition is attached as **Exhibit 5**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 30, 2024.

s/ Aaron E. Nathan
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*Attorney for Ruby Freeman and
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